

**From:** Environment Canterbury  
**To:** [Mailroom Mailbox](#)  
**Subject:** Proposal for the Canterbury RPMP Plan [#57]  
**Date:** Monday, 3 July 2017 3:15:33 p.m.

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Organisation (the organisation that this submission is made on behalf of, where applicable)	The Canterbury Chilean Needle Grass Pest Management Liaison Committee
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Please tick those that apply

- I do wish to be heard in support of my submission; and if so,
- I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

Your submission on the Proposal for the Canterbury Regional Pest Management Plan

Part and Page Number: Part 1, Pg 46

Sub-part/Provision: Sub-part 95, Table 36

Oppose/support (in part or full): Oppose in part

Reasons:

With regards to Chilean needle grass, we oppose the 100% occupier funded rate for inspection and control. The funding rationale in the Cost Benefit Analysis document (Meeting the requirements of the Biosecurity Act 1993 and National Policy Direction for Pest Management 2015: Analysis of costs and benefits Report prepared for Environment Canterbury as part of the preparation of a Regional Pest Management Plan) refers to the impacts of Chilean needle grass being agricultural, but makes no mention of the wider implications to Canterbury's economy and environment that the spread of Chilean needle grass could cause.

Chilean needle grass has the potential to negatively affect environmental values by invading natural landscapes and reducing biodiversity, in a similar manner to parts of Australia where it has had a negative impact on rare native plant species (Faithfull, 2012).

In addition to the loss of biodiversity values, spread to public land could result in a loss of recreational areas, as has been seen in Marlborough with recent infestations identified at the Wither Hills Farm Park and Omaka airfield. Such infested areas may need to be closed to the public during seeding season (Nov - April) and organised events could be adversely affected to avoid the risk associated with people and vehicles spreading the plant. This could result in a loss of tourism opportunities and associated revenue in North Canterbury, at a time when many businesses are already struggling with the after effects of the November 2016 earthquake.

As the spread of Chilean needle grass has the potential to affect both rural and urban dwellers across the region, the burden of preventing this should not lie solely with rural land occupiers but should come from the wider regional community.

In addition to the concerns raised above, we would also like to note that the way in which the funding formulae is described in the proposed RPMP document is difficult to understand and requires greater clarification going forward. For example in the instance of Chilean needle grass, 100% 'occupier' funded inspections actually refers to a 'targeted rural rate on productive land', which is only detailed on page 103 of a separate document. For the general public this could be confusing and easily lead to misinterpretation.

References:

Faithfull, I. (2012). Biodiversity impacts of Chilean needle grass *Nassella neesiana* on Australia's indigenous grasslands. [online] Available at: [http://vuir.vu.edu.au/19944/1/lan\\_Faithfull.pdf](http://vuir.vu.edu.au/19944/1/lan_Faithfull.pdf) [Accessed 3 Jul. 2017].

We seek the following decisions from Environment Canterbury:

We would like Environment Canterbury to re-evaluate the funding formulae for Chilean needle grass, taking into account all potential impacts and not those solely related to agriculture. We would like the funding formulae to be split 50% occupier and 50% wider regional rate for inspections and control to reflect the potential impacts to the environment, tourism and recreation in the region.

We would like Environment Canterbury to display funding formulae in a manner that is less ambiguous and easier for the general public to interpret and understand.